

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMPLIFY CAR WASH ADVISORS LLC,

Plaintiff,

v.

CAR WASH ADVISORY LLC and HARRY
CARUSO,

Defendants.

Case No. 22-cv-5612

Judge John G. Koeltl

~~**PROPOSED**~~

PERMANENT INJUNCTION

The Court awards and enters the following permanent injunctive relief pursuant to 15 U.S.C. §1116:

1. This Injunction applies to Defendants Car Wash Advisory LLC and Harry Caruso (individually “Defendant” and collectively “Defendants”).
2. This Injunction concerns the AMPLIFY and AMPLIFY CAR WASH ADVISORS trademarks owned by Plaintiff (the “Amplify Marks”).
3. Defendants are permanently enjoined and restrained from:
 - a. using in any manner the Amplify Marks, or any colorable imitation or confusingly similar version of the Amplify Marks, exclusively or as a portion of any trade name, trademark, service mark, or active domain name;
 - b. offering, selling, or passing off any product or service under the Amplify Marks;
 - c. committing any acts calculated to cause consumers to believe that Defendants’ goods or services are those sold under the authorization, control, or supervision of Amplify, or are sponsored by, approved by, or otherwise connected with Amplify;

- d. registering or attempting to register either of the Amplify Marks or any colorable imitation thereof.
4. No later than thirty (30) days from entry of this Permanent Injunction, Defendants shall surrender and deliver up possession of the “amplifycarwash.com” domain to Plaintiff.
5. Pursuant to 15 U.S.C. § 1116(a), within thirty (30) days of the entry of this Permanent Injunction, Defendants shall submit to the Court a written report, under oath, detailing their efforts to comply, and certifying their compliance, with this Order.
6. This Court retains jurisdiction over this matter for the purpose of enabling any of the parties to apply to this Court at any time for further orders and directions as may be necessary or appropriate to carry out or construe this Permanent Injunction, to modify or terminate any of its provisions, to enforce compliance, and to punish violations of its provisions.

SO ORDERED.

August 13, 2025

/s/ John G. Koeltl

The Honorable John G. Koeltl
United States District Court Judge